



COATED AND SPECIALTY PAPERS DIVISION

BOWATER INCORPORATED

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CERTIFIED MAIL

September 1, 2005

Ms. Elizabeth J. Basil  
SC DHEC  
Engineering Services Division  
Bureau of Air Quality  
2600 Bull Street  
Columbia, South Carolina 29201-1708

Re: White Liquor Storage Tank Permit Application Information Request

Dear Ms. Basil:

Bowater Coated Paper and Specialty Papers Division has received your request for additional information concerning the White Liquor Storage Tank Permit Application. The response to each of your questions is below.

- 1. What is the max true vapor pressure of the tanks? It is indicated it is less than 3.5 KPa, but please supply the actual number.**

The maximum true vapor pressure for white and green liquor is 0.48 kPa.

- 2. Supply more explanation on why PSD is not triggered. Will the new tank debottleneck operations due to decreased capacity in the past? It was mentioned that the tanks being replaced are already out of service, so will this increase any throughput at the mill? Is this project tied in any way to the current PSD/LAER application in-house? Will the causticizing area debottleneck? What are the actual to future actual emissions based on this project?**

The new storage tank is being constructed to restore storage capacity of white and/or green liquor during mill outages. The three tanks this tank is replacing were taken out of service in 2003.

Constructing these tanks is necessary to restore lost storage capacity and is not dependent on the current PSD/LAER application previously submitted. The calculations provided in the application for the new tank and converted swing tank show an increase of 17.1 tons per year of VOC and 2.5 tons per year of TRS. Both of these emission increases are below the NSR thresholds.

- 3. Standard 8 does exempt sources that are subject to and are in compliance with a MACT standard. If there are no standards imposed on the storage tanks within the causticizing system, then it is my understanding that these sources need to be modeled.**

Based on Standard 8 Section I D, it is our understanding the facility is exempt from the requirements if the affected source is covered under a MACT standard. Causticizing operations were reviewed during the Pulp and Paper Cluster Rule and included in MACT I for use in the clean condensate alternative as discussed in the preamble. Therefore, the facility is exempt from modeling.

- 4. Are the tanks that are being replaced still listed in the TV permit? If so, please identify them.**

The new storage tank is replacing the following tanks: M27-0000, M27-0033, and M27-0045. Only one of the tanks (M27-0000) is currently listed in the insignificant activities.

If you have any further questions or require additional information concerning this application, please contact me at (803) 981-8759.

Sincerely,

Jacquelyn Taylor  
Environmental Engineer